

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**PLAINTIFFS' THIRD JOINT REQUEST FOR PRODUCTION
OF DOCUMENTS AND INSPECTION OF THINGS
TO STATE DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (“Rule[s]”), Plaintiffs request that Defendants Secretary of State Brad Raffensperger, the State Election Board, and the State Election Board Members (collectively, the “State Defendants”) produce and make available for inspection the documents on an expedited basis electronically stored information and tangible things specified herein below in this Set of Requests for Production (the “Requests”).

Definitions

Plaintiffs hereby incorporate by reference all definitions provided in the Plaintiffs' August 3, 2020 Joint Request for Production of Documents and Inspection of Things to State Defendants.

Instructions

Plaintiffs hereby incorporate by reference all instructions provided in the Plaintiffs' August 3, 2020 Joint Request for Production of Documents and Inspection of Things to State Defendants.

REQUESTS FOR PRODUCTION

Request for Production No. 18:

One of each of the following, including all necessary charging devices, cords, cables, ink, and other material required to use the devices listed below:

- a. Dominion ImageCast X (ICX) Prime 21" BMD;
- b. ImageCast Precint (ICP) Scanner;
- c. KnowInk Poll Pad electronic pollbook; and
- d. 1 box of ballot paper with a minimum of 100 ballots.

In addition, Plaintiffs request one each of each of the following items, as identified in STATE-DEFENDANTS-00048761:

- a. Programmed Technician Card

- b. Programmed Poll Worker Card
- c. USB Drive containing information from GA ICX BMD programming group
- d. Print out of Ballot Activation Codes
- e. Programmed Compact Flash Cards for Polling Place Scanner
- f. Programmed Security Key Tab for Polling Place Scanner
- g. Election Project User names and Passcodes
- h. Technician Card Passcodes
 - i. Technician Card Passcode
 - j. Poll Worker Card Passcode
 - k. Security Key Tab Passcode
- l. Polling Place Scanner Re-zero Passcode
- m. Poll Pad User name and Passcode
- n. Poll Pad Menu Code

Respectfully submitted this 1st day of September, 2020.

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2020, a copy of the foregoing
**PLAINTIFFS' THIRD JOINT REQUEST FOR PRODUCTION OF
DOCUMENTS AND INSPECTION OF THINGS TO STATE DEFENDANTS**
was served on all counsel of record by electronic delivery of a PDF version.

/s/ David D. Cross
David D. Cross